

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

HESTAL LIPSCOMB,)	
)	
Plaintiff,)	
)	
v.)	C.A. No. 05-477 SLR
)	
ELECTRONIC DATA SYSTEMS)	
CORPORATION,)	
a Delaware Corporation,)	
)	
Defendant.)	JURY TRIAL DEMANDED

TO: Alyssa M. Schwartz, Esquire
Richards, Layton & Finger, P.A.
920 King Street, P.O. Box 551
Wilmington, DE 19899-0551

NOTICE OF DEPOSITION *DUCES TECUM*

PLEASE TAKE NOTICE that plaintiff will take the deposition *duces tecum** of Life Insurance Company of North America on April 3, 2006 at the offices of Esquire Deposition Services, 1700 Pacific Avenue, Suite 4750, Dallas, Texas 75201.

SMITH, KATZENSTEIN & FURLOW LLP

/s/ Laurence V. Cronin
Laurence V. Cronin (#2385)
800 Delaware Avenue, 7th Floor
P.O. Box 410
Wilmington, DE 19899
(302) 652-8400
Attorneys for Plaintiff

Dated: March 17, 2006

***Attendance at the deposition will be waived if the records requested in the attached Exhibit A are received on or before April 3, 2006.**

CERTIFICATE OF SERVICE

I hereby certify that on this 17th day of March 2006, I caused a copy of the foregoing
NOTICE OF DEPOSITION to be served on the following counsel of record via e-filing:

Alyssa M. Schwartz, Esquire
Richards, Layton & Finger, P.A.
920 King Street, P.O. Box 551
Wilmington, DE 19899-0551

/s/ Laurence V. Cronin
Laurence V. Cronin (ID No. 2385)